## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

WYNDHOLME VILLAGE, LLC, et al.

**Plaintiffs and Counterdefendants** 

**CIVIL ACTION NO. L01-3809** v.

NADIF OF WYNDHOLME, LLC, et al.

**Defendants and Counterplaintiffs** 

## MOTION FOR SUMMARY JUDGMENT

Defendants, NADIF of Wyndholme, LLC, WVI, LLC, John R. "Jack" Quinn, and Howard "Rusty" Zukerman, by their counsel, hereby move for summary judgment on all claims brought by Wyndholme Village, LLC, James M. Lancelotta and Katherine A. Lancelotta in the above case. The grounds for this motion, as amplified in the attached support memorandum, are that there are no disputed materials facts and the defendants are entitled to the judgment as a matter of law.

/s/ William C. Sammons

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Attorneys for Defendants and Counterplaintiffs

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 11<sup>th</sup> day of August 2003, a copy of the foregoing Defendants' Motion for Summary Judgment, Memorandum in Support, and proposed Order was sent by first class mail, postage prepaid to:

> Howard J. Schulman, Esquire Schulman & Kaufman, LLC One Charles Center 100 North Charles Street Suite 600 Baltimore, Maryland 21201 Attorneys for Plaintiffs and Counterdefendants

Howard "Rusty" Zukerman 62 Terrehans Lane Syosset, New York 11791 Defendant

Stuart C. "Neil" Fisher 173 Root Trail Palm Beach, FL 33480 Defendant

/s/ William C. Sammons

William C. Sammons